THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

LEMOND CYCLING, INC.,

Dated: April 11, 2008

Case No. 08-CV-01010-RHK-JSM

Plaintiff,

v.

DEFENDANT'S MOTION TO TRANSFER

TREK BICYCLE CORPORATION,

Defendant.

Defendant Trek Bicycle Corporation ("Trek") hereby moves, pursuant to 28

U.S.C. § 1404(a), to transfer the above-captioned action from the United States District

Court for the District of Minnesota to the United States District Court for the Western

District of Wisconsin. The grounds for this motion are that this action could have been brought in the United States District Court for the Western District of Wisconsin and the interest of justice and convenience of the parties and witnesses support the transfer to that Court. The grounds are set forth in further detail in the Memorandum of Law and Affidavits filed by Trek in support of the motion and the record in this case.

HALLELAND LEWIS NILAN & JOHNSON, P.A.

By: /s/ Erik Salveson

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